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## ABSTRACT

This study examined efforts at the local level to reduce the fragmentation of services to students with and without disabilities through the consolidation or blending of federal and state categorical educational programs. Twenty-two state and local program administrators in California, Maryland, and Massachusetts were interviewed. Findings include examples of collaborative programs and of administrative mechanisms such as school improvement plans, consolidated staffing plans, and schoolwide Title I programs. Specific challenges to program consolidation are identified, including multifunded students, bilingual teacher shortages, Title I program audits, and nonsupplanting requirements. Finally, the human factor in change is addressed, noting the roles of program leadership, lack of knowledge, advocacy for students and programs, teacher attitudes and qualifications, and the "power" of special education. Findings suggest that there is a clear trend to foster greater collaboration at the school building level, with the focus on inclusion of students with disabilities having a significant influence. Additionally, changing demographics and increasing fiscal concerns are creating pressures on local school districts to use resources more efficiently and find more flexible ways to educate increasingly diverse student populations. A list of interviewees and interview questions is appended. (DB)

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# Consolidated Special Education Funding and Services: *A Local Perspective*

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Center for Special Education Finance

Policy Paper Number 5

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# Consolidated Special Education Funding and Services: *A Local Perspective*

Margaret J. McLaughlin

**Center for Special Education Finance**  
**Policy Paper Number 5**  
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The Center for Special Education Finance (CSEF) was established in October 1992 to address a comprehensive set of fiscal issues related to the delivery and support of special education services to children throughout the U.S. The Center's mission is to provide information needed by policymakers to make informed decisions regarding the provision of services to children with disabilities, and to provide opportunities for information sharing regarding critical fiscal policy issues.

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A companion CSEF policy paper will provide a federal perspective on consolidated special education funding and services. Authored by Deborah A. Verstegen, University of Virginia, this paper will be issued later this year.

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# I. Introduction ---

## Background

During the past decade and a half, program administrators and educational policymakers have paid increased attention to the impact of federal and state categorical programs on educational systems. Specifically, concern has focused on the segregation and fragmentation of educational experiences provided to students through programs such as the federal Chapter 1 (once again to be called Title I of the Elementary and Secondary Education Act), Title VII of the Bilingual Education Act, Migrant Education, and Part B of the Individuals with Disabilities Education Act (IDEA) (Allington, Steutzel, Shake & Lamarche, 1986; Will, 1986). Similar concerns exist about the myriad of *state* categorical programs, many of which parallel the federal aid programs or provide supplementary funding to schools to serve specific categories of students.

These concerns have been prompted by several factors: a desire to reduce the segregation and labeling of students, the increasing number of students considered to be "at risk," and a growing belief in the need to reduce fragmented educational services for all students, and especially those who are "multifunded"—that is, students who are eligible for special education and compensatory education services. The latter two factors result from the rapidly changing demographics within America's schools, which have increased the numbers of students who are economically disadvantaged, do not speak English as their primary language, and who are identified as having disabilities. The changing student population, shifts in the philosophical and pedagogical approaches to service delivery, increasing categorical program costs, and concerns about the most efficient use of scarce resources are all causing a reassessment of the structure and purposes of these categorical programs.



The structures of categorical programs are similar in their intent to provide supplementary funding to schools to enhance the basic education provided to specific targeted students. Thus, Title I and the similar state-level compensatory education programs seek to enhance the educational opportunities of low income underachieving students, while the limited English program is designed to support students who are not primary English-language speakers. Among these programs, the IDEA differs in that it is an entitlement program that guarantees access to a free and appropriate public education to students with identified disabilities. Thus, the funding for special education programs and services must meet the needs of the population, while such programs as compensatory education can be provided to eligible students based on the levels of funding available.

Because these categorical programs were conceived as supplementing the basic education provided by schools, a primary concern of federal and state policymakers has been to ensure that the targeted dollars do not supplant what schools are already committed to providing to all students. Thus, the programs were conceived to be separate entities, both fiscally and programmatically. As indicated in an early study of state response to federal categorical programs (Moore, et al., 1983), the regulatory demands of these programs quickly resulted in separate program structures, which include administrators and separate divisions or bureaucracies within state departments of education (SEAs). These structures clearly defined the parameters of the programs and created distinct identities, including separate personnel funded by the specific program, separate professional development, and separate practices or instructional programs.

The separation of programs coupled with non-supplant requirements caused many of the educational interventions to be delivered outside of regular classrooms. Students eligible to receive one or more of the supplementary programs were pulled out for some portion of time each day or week to receive remediation, English-language instruction, special education interventions, or other specialized services. Each of these services could be designed and delivered without linkage to the core curriculum and instruction that was occurring in the regular classrooms.

Over time, however, concern about the lack of coordination and redundancy across programs at the classroom level, as well as the lack of strong evidence to support the efficacy of much of the pull-out instruction, prompted school administrators to begin to examine new models of collaboration and

consolidation across categorical programs (Allington, et al.; Madden & Slavin, 1986; Bulgren & Carta, 1992). These efforts to create more integrated programs have been promoted at local, state, and federal levels through both regulatory changes and innovations and changes in basic practices within individual schools.

## Purpose

This study examines efforts at the local level to reduce the fragmentation of services through the consolidation or blending of federal and state categorical educational programs. Although this is an exploratory study based on the experiences and judgments of respondents at a limited number of case study districts, it begins to identify trends in the design of programs, as well as some of the specific issues that schools confront in their attempt to consolidate educational programs or services. For example, how are these reforms being implemented? What are the barriers to change and how are they being resolved? To what extent are these perceived obstacles internal to the school or district (i.e., organizational culture issues)? And to what extent are they external (i.e., resulting from real or perceived state and federal rules and regulations)? The study examines the degree of consolidation occurring within schools and identifies some of the specific strategies being used to promote these new models.

Within this paper, terms such as *consolidated* and *collaborative* are used to refer to the practices designed to reduce fragmentation of educational services or instruction at the school level. They do not necessarily imply an actual blending of funds, nor that other resources such as personnel are not identifiable. The terms also do not imply that all specialized services must be provided within the regular classroom. A Title I state director referred to the concept as "braided" programs, meaning that personnel and services work closely together, but that separate strands are identifiable at the district or school level.

## II. Method

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The investigation involved interviews with state and local program administrators in California, Maryland, and Massachusetts. California was selected because the state has had a major initiative to consolidate state categorical programs since the early 1980s. The *Every Student Succeeds* initiative (ESS) is a more recent state-level effort to promote flexibility and collaboration among programs in local schools and districts that is linked to California's core curriculum and state assessments and is reflected in individual school improvement goals. Massachusetts has a five-year grant program entitled "Restructuring Schools for the Integration of All Students," involving seven school districts. The districts were awarded grants averaging \$75,000 annually to increase the coordination among all school programs, to increase the integration of students with disabilities into regular classrooms, and to reduce the numbers of students who were referred to special education. While Maryland did not have a specific statewide initiative to promote consolidation, several local education agencies (LEAs) had designed programs in an attempt to promote greater collaboration.

A total of 22 individuals were interviewed (see Appendix A for a listing of names). Although state and local program administrators were the primary sources of information, two individuals with a more national perspective were also asked to react to the general themes and observations that had emerged from analyses of the interviews. Individuals were selected on the basis of referral. Initial contacts were made with key informants in each state who were known to the author. These individuals suggested others whom they perceived to be knowledgeable about some aspect of program consolidation who, in turn, recommended others. Followup continued until data saturation was achieved—that is, until no additional new information was obtained.

Interviews were open-ended, but guided by the questions listed in Appendix B. Initial interviews began using all of these questions. Subsequent interviews with those referrals tended to be more focused on one issue, such as audit procedures or specific program initiatives.

### III. Findings

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The interviews were initially analyzed according to the interview questions. These categories were then revised to reflect the following broader issues: examples of consolidated programs; issues related to program administration (e.g., fiscal management and program reviews; issues supporting or constraining program consolidation; and human factors that affect change). Findings related to the first two issues are discussed in this section; while sections IV and V focus on challenges to program consolidation and human factors, respectively.

#### Examples of Collaborative Programs

According to local administrators, the ways in which schools are choosing to reconceptualize their categorical programs can and do differ from school to school depending on "the leadership or direction set by the principals and the willingness of teachers to collaborate." In addition, factors such as the availability of specialists, particularly bilingual teachers, influence the type of collaboration. Administrators indicate that the desire to increase collaboration has been substantially influenced by two factors: (a) the push to increase integration of students with disabilities and to reduce the numbers of students being identified as eligible for special education; and (b) the mounting evidence from federal and state evaluations of Title I programs that pull-out models, which focused on remediation of basic low level academic skills, were ineffective in substantially increasing standardized test gains. In addition, the overlap in educational goals and instructional services across Title I, special education, and other services students receive, such as remedial reading has prompted the desire to create more integrated education. Yet, the bilingual program administrators at the sites studied appeared less enthusiastic about fully integrating services in the

absence of regular classroom teachers who are bilingual or multilingual, although they endorsed the need for collaboration among all the specialists in a building.<sup>1</sup>

Almost every administrator interviewed spoke of the need to stop pulling students out of core instruction and to find ways to supplement instruction in the core curriculum and to support individual students either in the context of the class or through extended day, evening, or other supplemental models.

In general, collaboration fell into two categories: (a) collaboration among teachers but separation in the delivery of instruction (i.e., categorical teachers instructed only eligible or identified students but collaborated or worked together to ensure continuity of instruction), and (b) collaboration among teachers who instructed heterogeneous groups of students.

Some schools, in an effort to reduce fragmentation of services, are encouraging collaboration and continuous communication among regular and special teachers, including having special teachers come into regular classrooms to work with identified students or provide specialized services in an after-school program. An example of teacher collaboration is the student study team or a similar support team staffed by regular classroom teachers, special educators, Title I teachers and other specialist as needed. This type of team provides support to individual teachers regarding specific students. An additional attempt to foster professional collaboration in one school district required that the multidisciplinary team that developed Individual Educational Programs (IEPs) include Title I and bilingual teachers as well as the regular classroom teacher.

In the second type of collaboration, team teaching among regular and specialist teachers occurs and students are instructed in mixed groups. Massachusetts resource teachers or "support specialists" work within classrooms with individual or small groups of students who need extra academic help. Some of the students may be eligible for special education, some for Title I, or bilingual education. Other students the specialist works with may not be eligible for any categorical program. The intent of this model is to provide extra assistance to students in a regular classroom as well as to reduce referrals to special education. In addition to the "support specialist," all teachers in a building collaborate,

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<sup>1</sup> A more detailed, longitudinal study of similar issues conducted by Anthony & Rossman (1993) found that while bilingual program administrators were reluctant to support integrated services, bilingual teachers were often quite supportive.



communicate, and divide classroom instructional responsibilities on a daily or weekly basis. This can mean shared teaching of lessons to groups of students including those eligible for specialized instruction such as special education, Title I, bilingual, remedial reading, and similar programs. It can also mean in-class reinforcement of lessons or specialized one-on-one instruction. In some districts, other specialists, such as speech and language therapists, also work in the regular classroom assisting in language development through providing language lessons. Almost all instruction for each student takes place within the context of the regular classroom, although it is acceptable for small groups of students to be pulled aside for more intensive work in a specific skill area. These groupings must be flexible, and occur only as needed to reinforce the core instruction. Further, the groups are not based on the eligibility of students for specific programs.

Another version of collaborative programming, the *learning resource center model*, is being used in some California districts as well as in several other states. The learning resource center is a place staffed by resource specialists funded by various categorical programs. A center may have a special education teacher, a bilingual teacher, a remedial reading teacher, and a Title I teacher or aide, each of whose salaries are paid from the various categorical programs. The resource centers are generally well supplied with technology, as well as other materials and equipment. The funds supporting the equipment and supplies typically come from a variety of sources. Most commonly, students come to the center for short- or long-term assistance regardless of program eligibility. In one school district, only students who were eligible to receive services under at least one categorical program could access the learning resource center. Although originally created for students identified as learning disabled, these centers were expanded to serve students with a range of academic needs. This could include students with more moderate disabilities, as well as students who had been absent from school for some period and needed assistance in catching up. While these centers result in students being "pulled out" from the regular classroom, they do require collaboration across categorical programs, as well as the co-funding of staff positions. In addition, the center approach provides a way to serve "multifunded" students who are eligible for more than one categorical program and who, under traditional pull-out models, would be going out of the classroom to two or more special teachers during a school week.

Regardless of the particular approach, collaborative models were promoted by local administrators who talked about the need to ensure that all students were

accessing the district's core curriculum and to ensure that "schools as a whole were improving" according to some set of assessments or indicators. School Improvement Plans were frequently mentioned as the central organizing element in the collaboration. Under such plans, school staffs are typically charged with identifying schoolwide improvement goals, including raising student test scores or increasing the integration of students with disabilities. However, the degrees of freedom given to individual schools to design programs to address their school improvement needs vary significantly. These variations will be discussed in the next section.

## Program Administration

Districts are clearly moving toward greater collaboration among teachers and a greater emphasis on providing supplemental education and support within the context of regular classrooms. Efforts to create more flexibility tend to be focused at the school level, while program administration and fiscal management remain largely separate in the districts. This exists despite state-level efforts to promote greater collaboration among administrators and more flexibility in the use of categorical program resources. As Dr. Pat Anthony, evaluator of the Massachusetts restructuring initiative observed, "There are really four populations out there . . . special education, Title I, bilingual, and regular education. They still seem distinct. They're still headed up by separate directors; there is no reorganization at the district level; and turf issues are big."

Despite the separation, joint planning and collaboration among administrators of various programs are key parts of systemwide restructuring efforts. Even districts that have more conservative or less global approaches to the educational restructuring process report efforts to increase the communication among program leaders and collaboration at the school level. In fact, several individuals interviewed strongly assert that to make collaboration work, a district must begin from a departmental perspective and create a shared ownership for program improvement. Following is a discussion of some of the administrative mechanisms being used by states and some districts to promote flexibility and consolidation.<sup>2</sup>

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<sup>2</sup> Categorical program offerings in all three states vary in terms of funding, eligibility, staffing, and administration. However, they have all moved to create greater flexibility in the use of state categorical monies. Discussion in this paper will be limited to highlighting key features of programs being used to promote flexibility.



### ■ School Improvement Plans

As noted earlier, schools often use the School Improvement Plan as the focal point for collaborative goal setting and planning and as a keystone in the school restructuring process. These plans, which are foundational in school restructuring, typically are developed through consensus of principal and faculty, parents, and other community members. The plans are almost always organized around a set of school outcomes, including student achievement. District administrators use these plans as a way to encourage schools to think of more innovative uses for school resources, such as Title I teachers or aides and special educators. The primary objective is to move *all* students toward the same outcomes and to permit school staffs to develop their own approaches to instruction. The concept of local site-based decisionmaking can work only if schools are permitted to use resources flexibly.

### ■ Consolidated staffing plan

One mechanism used to support the school improvement process is a "consolidated staffing plan," or similar consolidation of budget categories that results in a block of money or a fixed number of staff positions allocated to the school. None of the administrators interviewed indicated that any school is presently working under a "pure" form of block grant with a flexible pool of dollars flowing to the schools. More typically, compensatory education, drug-free schools, or a variety of state categorical program dollars flow to the school in a block; however, special education resources are usually separated, as might be Title VII funds. The resources, including staff, may be used once they are allocated to the school. The purpose of the consolidated staffing plan is to reduce the paperwork for schools and reinforce a climate of collaboration. Budgets are disaggregated at the district level, and accounting procedures assure that districts are in line with existing regulations governing program eligibility and the non-supplanting provisions.

### ■ Schoolwide Title I programs

Schoolwide Title I programs are reportedly easiest to involve in the consolidated planning process. Models such as learning resource centers, "support specialists," and schoolwide cooperative learning are supported through a school-based consolidated budget process. Often, the positions supporting these models are multifunded from a variety of sources; however, positions may come to the school funded by a specific budget and then be used to support a

collaborative teaching model. Local district administrators were not entirely certain of the source of funding (e.g., local, state, or federal dollars) supporting the positions. They were relying on the permission of state-level program administrators to develop more collaborative models. For example, one district that uses schoolwide cooperative learning groups sought permission to use a Title I teacher and aide to instruct the groups. The district administrators were told by state-level Title I administrators that this was permissible, "as long as the instruction is geared to the Title I students."

#### ■ Replacement model

Some Maryland districts are using a "replacement model" for Title I funding that involves staffing an entire classroom with two teachers using a variety of resources. In this model, the first teacher is locally funded and the second is funded by Title I monies proportional to the numbers of Title I-eligible students in the classroom. The remaining salary for the second teacher comes from the state compensatory education monies. This model was approved by the federal Title I administration for use by the state of Maryland and represents one of the ways that the federal-level Title I program has attempted greater flexibility. In other jointly funded positions using federal or state Title I dollars, some accounting of how teachers spend their time and how salaries are being prorated has been required, sometimes through onerous paperwork.

#### ■ Consolidated grants

Consolidated grant applications are being used at the district levels in California and Massachusetts, two states which have a process for developing a consolidated application for all categorical funds. However, while special education is part of the consolidated application process in Massachusetts, it is not yet included in California. Preparing a consolidated application for state categorical funds requires that the various program directors come together and propose how they will provide specialized services to the targeted students. However, the joint planning process is reportedly no guarantee that collaborative programming will actually result.

The consolidated application process in California is part of the School-Based Coordinated Program Act (SBCPA), which dates from the early 1980s. The Act was intended to reduce paperwork and foster efficiency through the coordination of certain state categorical resources, including the State Special Education Program. Under SBCPA, specific program flexibilities are allowed if specific

student needs are identified, written into the school plan, and agreed to by the School Site Council and district. While most California school districts reportedly participate in the program, few districts reportedly are actually mingling funds, and there is limited collaboration among staff. Almost all administrators indicated that the program is most attractive because participation permits a district to designate eight professional development days a year. As noted above, the consolidated application process does not include special education or Title VII funds. Furthermore, the application is perceived basically as a shell or introductory piece that must be supplemented with additional paperwork responding to individualized program regulations. This is also the case in Massachusetts. Nonetheless, the "forced" collaboration and joint planning among various district level program administrators were perceived as creating greater collaboration at the school level and there was some reduction in paperwork.

#### ■ **Sharing of professional development resources**

Another form of collaboration is the sharing of resources for professional development. Several districts reported that the various categorical programs commit fixed proportions of their professional development monies to a common pool to support systemwide professional development objectives. In one Massachusetts district this portion represents 50 percent of each of the program staff development budgets. Joint professional development further enhances teacher collaboration and supports the core curriculum. For example, one district is training all of its elementary-level teachers, including special educators, Title I teachers, and bilingual education teachers, in a specific approach to phonics. Resources for this professional development are drawn from multiple program budgets.

#### ■ **Coordinated compliance review**

California is also using a coordinated compliance review process. The state has a 12-year history of using this review, in which school districts are monitored every four years by a team consisting of Title I, special education, bilingual, and other categorical program staff. The team examines all categorical programs at one time and attempts to model the collaboration and cross-program communication that the SEA is urging local districts to adopt. Local administrators are generally enthusiastic about this approach because it forces the various district program administrators to come together and "lay everything on the table at once." It is also said to result in less paperwork than the prior, individual review procedures.

One district administrator reported that the process was an eye opener for her and others in her district when they realized the duplication of efforts and the general similarities across programs. She credits the review with helping to facilitate greater collaboration among the categorical administrators in her district.

An important aspect of the California compliance review process is the shift from an emphasis on inputs and process to examining outcomes. For example, the state team's have been directed to examine the services received by students involved in one or more of the local or state categorical programs. Some of the integrated compliance questions include the following: Do these students have access to the district's core curriculum? Do they have an integrated program linked to the core curriculum? Do they receive services designed to provide access to the core curriculum? These areas are designed to ensure that all students have an opportunity to have a high quality education. The eventual intent reportedly is to use student outcome assessments as part of the compliance monitoring criteria. The key issue is to provide evidence that students are learning the core curriculum and not just receiving services. However, the lack of such evidence as assessment data for all students, and particularly for special education students, is a barrier to moving fully toward this outcome-based accountability model.

The consolidated monitoring process is not without some problems in California. Because the SEA has established a division responsible for the consolidated monitoring, other categorical program divisions reportedly do not see monitoring as their primary responsibility. Yet, they must staff the teams and provide both follow-up and ongoing technical assistance to districts to improve programs. As a result, some local and state-level respondents reported that follow-up assistance and program scrutiny have diminished.

#### ■ Restructuring initiatives

California has a major restructuring initiative called *Every Student Succeeds* (ESS), mentioned earlier in this paper. The initiative resulted from a 1990 study that examined students at risk and originated within the Division of Special Education. The ESS provides a framework for local districts to engage in a comprehensive planning process to ensure that all students are learning California's core curriculum. The 10 districts participating in the initiative put all the policies and procedures on the table, including various program regulations, teacher union contracts, and district policies. To the extent that they perceive any

of the regulations as barriers to improving educational outcomes, the district may seek waivers or examine alternatives with the state's assistance. This initiative in California is much like the Massachusetts pilot restructuring initiative in that relatively few districts are presently involved. The inclusion of special education in the ESS initiative has reportedly been stymied by several aspects of state regulatory policy. One is the state formula which requires that special education funds be used to purchase an identifiable special education provider (or multiple persons sharing a position). In addition, the special education person must have special certification and may not have any other position beyond that of special educator. However, the SBCPA flexibilities mentioned earlier allow certain special educators to serve nonidentified special education students under certain circumstances.

Administrative processes such as regular meetings, consolidated grant applications, or participating in coordinated program audits, set a course for greater collaboration and flexibility. Yet, several issues emerged that pose challenges to greater program consolidation. These include a) multifunded students; b) bilingual teacher shortages; c) Title I program audits; and d) non-supplanting requirements.

## IV. Challenges to Program Consolidation

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### Multifunded Students

The approaches described above respond to the need to create more coordinated educational services, reduce the segregation of students, support at-risk students, and reduce the number of students identified for special education. To some degree, the approaches also respond to the service delivery needs of the multifunded students. However, as several administrators noted, conceptualizing how the resources flow to these students remains a challenge, even though the intent of many of the collaborative efforts is to avoid a "your student/my student" mentality.

The challenge in some districts occurs when the student is identified as eligible for special education, as well as one or more other programs. The reasoning provided by several local California Title I administrators is that special education is to provide everything that is required by a student with a disability to benefit from his or her educational program. According to these administrators, technically, no other supportive services such as those provided by Title I or bilingual education should be needed. As stated by one respondent, "The question is where does special education start and stop?" This issue is further complicated by the fact that in accordance with federal and California law, Title I and bilingual services must be provided if the special education student qualifies for them.

In general, there is some resistance among all those interviewed to the notion that students should receive additional services "just because they are eligible." One school district administrator said that he and his colleagues in special education



are opposed to simply "dumping" students in various programs, so they have initiated a sorting process that begins with the IEP. In the case of a student identified as eligible for special education as well as Title I and/or bilingual education, interviewed program administrators generally reported that special education services were defined first. Then a determination was made regarding what additional services not defined as "special education or related services" are required to be provided by Title I or bilingual education. However, according to a state-level program administrator, "This is a technical, legal problem because Title I and LEP service determinations are supposed to be made prior to providing special education services." Perceptions about what is legally required, as well as what is most appropriate, for multifunded students vary. As a result, some district administrators are engaged in more broadly defining the structure and operation of categorical and other supplemental educational programs. Administrators in these districts perceive the increased number of multifunded students as a major motivator for principals and other school staff to develop more collaborative and integrated classrooms.

## **Bilingual Teacher Shortages**

Learning resource centers, collaboration, team teaching, and consultation involving teachers who are paid from multiple sources seem to be the more typical interventions being used for students identified as eligible for special education, Title I, state compensatory education, or some other academic support program. Bilingual education is somewhat different. Due to the large shortages of bilingual teachers and the increased number of languages and dialects spoken in the classroom, the notion that bilingual students can be adequately supported in a general in-class collaborative model or by generic learning support specialists is less endorsed. As one bilingual director noted, "You get some limited English proficient students in a class with some disabled students and other low achievers and you have a three-ring circus. The teacher can't manage these needs and the bilingual student loses out."

There are a number of approaches to providing English language instruction that include side-by-side instruction (e.g., English language development programs, half-day English immersion and half-day instruction in the primary language) for LEP students to learn their district's core curriculum. The common goal of these approaches is to enable the bilingual student to access the full curriculum and to move as quickly as possible into regular classrooms. Issues of fragmentation or segregation are not preeminent among bilingual education administrators; rather

the concern is the general lack of available teachers who are competent to teach the many multilingual students who are now in the schools. Regardless of whether the student is pulled out or educated within a regular classroom, the student needs competent native language speakers as instructors, and those individuals are rare within the teaching force at large. The issue is particularly exacerbated for non-English speaking special education students, where teachers may need both special education certification *and* be able to speak the student's language. These "dual qualification" requirements create significant barriers to the notion of seamless collaboration and flexible instructional groups.<sup>3</sup>

## **Title I Program Audits**

Individual program audits are seen as a barrier to increased consolidation and collaboration in the school districts studied. The audits which create the greatest perceived barriers are those that focus on the use of Title I monies and the assurance that these dollars are not supplanting local funds, and that Title I students are indeed receiving supplemental services. As one administrator noted, "Those of us in Title I operate within a culture of audits and fear of loss of money." Title I administrators generally still feel a responsibility to ensure that the time and effort expended on Title I-eligible students are clearly visible in the schools (i.e., the students are getting something extra).

Thus, while districts are promoting greater collaboration among programs, some of those interviewed also still require strict accounting of teacher time, similar to the concept of billable hours. Even in those districts in California and Massachusetts that have been given the opportunity to explore new options and work with the SEA to obtain waivers or clarifications of policy, there is a great deal of variability in how schools mix resources. Furthermore, the degree to which districts feel constrained by fear of audits is specifically linked to differences in Title I leadership at the state and/or local levels. The most frequent responses to questions concerning the frequency or focus of program audits were, "There has been less emphasis on precise accounting of teacher time and resources since we got a new Title I director in our [district or state]." In

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<sup>3</sup>A similar investigation conducted by Anthony & Rossman (1993) reported reluctance on the part of parents of bilingual education students and bilingual education teachers to embrace collaboration because of fear that the students will lose their sense of culture. Also, parents were fearful that their children would not receive the same level of services if integrated in regular education classes. Bilingual education teachers shared the same belief as special education teachers that inclusion, collaboration, and integration were being pushed primarily to save money, and, in the end, that their students will lose services.



general, most administrators acknowledged that Title I had set the precedent for audits and the climate of fear of loss of money. "They're the granddaddy," said one administrator.

The historical focus on accounting for every dollar is deeply embedded in memory, even if it is not still actually present in state or local regulations and procedures. For example, schoolwide Title I and other restructuring initiatives have created climates of greater flexibility. However, the concept of a strict accounting of funds remains deeply embedded in the philosophy and operation of many school districts. It does appear that a new generation of Title I directors at the state and local levels are more comfortable with the increased flexibility that has been offered within the federal Title I regulations.<sup>4</sup>

Nonetheless, all Title I directors still spoke of the need to be very vigilant about non-supplanting requirements because they all could cite specific examples of districts that were given permission to do certain things that "have come back to haunt them" in an audit. As one Title I director said, "The buck stops with the LEA. They have to give the money back and it impacts kids and schools." Neither bilingual nor special education leadership appear to be as rigidly focused on program audits and non-supplanting requirements. However, as discussed below, administrators within these programs are not unanimously enthusiastic about blending services.

## Non-supplanting Requirements

The major challenge to creating more flexible and collaborative programs is to ensure that categorical program funds supplement or are used to provide educational services beyond what other noneligible students receive. From a state perspective, administrators generally agree that there is still no good answer to how funds from the disparate state and federal programs can be audited or tracked within collaborative programs. State administrators see the problems as residing within the federal regulations for categorical programs; local administrators tend not to be certain whether state or federal regulations are creating barriers. However, most administrators acknowledge that some

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<sup>4</sup> One state-level administrator commented that under the recently reauthorized ESEA/Title I, many more schools will be eligible for schoolwide programs: in 1995-96, they will be eligible if 60 percent of the students are "poor," according to the district's poverty criteria; in 1996-97, they will be eligible if 50 percent of the students are "poor."

regulations are necessary and that adherence to the non-supplanting requirements assures that the targeted students are indeed getting extra services.

Concerns about the non-supplanting requirements have been exacerbated by the precarious fiscal climates of states and school districts. A program monitor in one state said that their audit teams want to actually see students receiving the supplemental services and are not satisfied with paper accounting procedures. This is because some school districts have become desperate to use categorical or supplemental funds to fill the gaps left by decreasing general education dollars. This program monitor reported that a local administrator had recently called to ask if the district could use some of their Title I dollars to pay part of a principal's salary.

With respect to Title I, local districts face real pressures to spread out the money and are using the maximum flexibility to rank eligible schools to attempt to get some extra dollars into as many schools as possible. This dilutes the amount of services available to eligible students, and also we're seeing an increase in audit problems as schools are stretching the limits of flexibility because of their own fiscal situation.

## V. The Human Factor in Change

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### Program Leadership

Almost every individual interviewed spoke to the issue of program leadership and the importance of having an advocate for collaborative programs "at the top." While state-level administrators discuss efforts to promote greater collaboration and program consolidation, they acknowledge that local-level administrators hold the key to making this a reality. One of the significant challenges is that many local administrators of categorical programs are not moving to endorse the concept of flexibility or consolidation at the pace state administrators would like to see. Conversely, local-level administrators consider state leadership critical to signaling to everyone in their district that the initiatives they are attempting are not only legal, but considered to be best practice by the state.

Conversations with a variety of local program administrators also revealed complex and diverse perceptions of what program consolidation or blending means. Local administrators appear to need a clear state-level edict regarding how programs are to be blended or what collaborative models should look like. For example, the California SEA wrote two 20-page program advisories about how the School-Based Coordinated Program Act (SBCPA) allows program flexibilities and coordination. However, beyond this type of advisory, from a state-level perspective, the move is away from being prescriptive to supporting local problem solving and model building. This is probably most evident in the general lack of knowledge some local administrators (as well as state-level program people) have about the requirements of various programs. Program administrators rely on the state program leaders and their own finance officers to

prescribe what is allowable or how budgets are to be constructed. Traditionally, program heads know that they can allocate resources based on some set of criteria and that these resources may be used in certain ways or models, all conforming to some legal standard. There is reportedly a great fear, as well as perhaps inertia, among many local district and school-level administrators to attempt to implement new ways of providing educational services. As noted earlier, Title I directors seemed most concerned about possible illegalities and do not trust state flexibility. A leadership void is compounded by a lack of knowledge of regulatory requirements.

## **Lack of Knowledge**

There is an apparent lack of knowledge of various program regulations among all program administrators. A number of Title I directors perceive special education as the barrier to greater collaboration because of the federal guarantee of individualized services. However, these directors admit that they know little or nothing of the specific state or federal program regulations and do not know where the barriers are. Conversely, special education administrators consider special education to be flexible compared to Title I. Special educators perceive Title I as over-concerned with audits and non-supplant requirements. However, as several state-level administrators noted, many program directors really do not understand their own program regulations or choose to protect that knowledge from others. When Massachusetts began its restructuring initiative, state administrators received a number of questions from concerned local directors who did not believe that regulations permitted certain practices. The state administrators said they provided numerous clarifications, but not one issue required an actual waiver.

Clearly, the key to making collaboration work is commitment and communication among administrators, followed by the development of a plan that is designed collaboratively and that every program can own. What seems to work best is when local program administrators meet together regularly to develop a common vision for how educational programs should be configured, with that vision guided by some common goals or learner outcomes. This team approach also appears to occur only when the superintendent provides the impetus and leadership. In districts with such leadership, a "can-do" attitude seems to propel everyone to look beyond current procedures and unresolved issues to provide better education for all students.

## Advocacy for Students and Programs

Generally, program administrators, particularly special education and bilingual program heads, voice a strong need to protect resources and programs for their respective students. Some special education administrators are concerned about commingling funds for fear that educational services will be diluted. Yet, overall they support increasing the inclusion of students with disabilities into regular classrooms, as well as reducing the numbers of referrals to special education. These administrators see the need to increase collaboration among teachers in a school and to use specialists in ways that can support both students with disabilities and those at risk of school failure.

As noted earlier, the administrators of bilingual programs are generally less optimistic about the concept of consolidated programs. They endorse the concept, but are concerned about the tremendous shortages of bilingual teachers and therefore the lack of potential for bilingual students to be supported in regular classrooms. Also, because of the limited state and federal funds available, these administrators feel the need to ensure that every dollar they do have is provided to the bilingual student.

Individuals interviewed also expressed a desire to protect the identity of their programs. Administrators of bilingual programs spoke of how bilingual students are the least empowered in the educational system. Bilingual students frequently come from families with little or no education, no knowledge of how to advocate for their children, and no status in the community at large. Therefore, these administrators believe that they, and the bilingual teachers, serve an important role as advocates for the students, as well as the families in the larger school system. They are understandably very concerned about losing their identities as well as their resources in a consolidated program. They are also convinced that their students would be the first to have their services diluted or lost.

"Turf guarding" was mentioned a number of times under the auspices of advocacy for programs. Two specific attempts to foster collaboration between Title I and special education in two separate school districts were reportedly actively sabotaged by the local Title I director because both models were promoted by special education and considered to be a new model that infringed on the carefully controlled Title I "world." This guarding of program resources and power that accrues with control of resources is a major challenge to program leaders who are seeking change.



Another important issue that emerged in discussions of consolidation was the need to separate the perception of disability from race, ethnicity, and language. Administrators reported that "some" people are very uncomfortable about the notion of consolidating programs if it means that somehow nonwhite and/or non-English speaking students would be perceived as "disabled." They feel that mingling the various types of teachers and services could in some way equate the students, and that it is very necessary to keep the concept of Title I and bilingual education separate from special education. At least one special educator was concerned that some sort of consolidated program might equate special education services, particularly for students with mild to moderate disabilities, with remediation, implying that the students' problems are short-term or fixable. The individual felt that the learning difficulties of some special education students are not "remedial" and will require consistent levels of support throughout their school years.

## Teacher Attitudes and Qualifications

Since this study did not focus on local schools, no principals or teachers were interviewed. However, some district administrators addressed the issue of teacher willingness to participate in a consolidated program as both a facilitator and a barrier. Several districts cited individual schools that had begun the process of consolidation through the initiatives of several teachers, including special education and Title I. In other districts, teacher resistance to changing practice has slowed the process of blending services. While principals can play a large role in creating the climate and expectations for collaboration, some teachers, particularly special education or remedial reading specialists, are reportedly finding it difficult to function in co-teaching or teaming models, perhaps due to lack of training or tradition.

Teacher certification and qualifications also impact the ability to enhance collaboration. As noted above, the lack of qualified bilingual teachers is problematic. Also, state regulations governing who can deliver special education services create barriers to using personnel more flexibly. In fact, special education is the only categorical program that has historically had rigorous and separate certification, although that is changing with bilingual education. The certification requirements also are perceived or pose barriers to greater collaboration at the school level as some school personnel believe that only qualified special educators may actually deliver special education services to students with disabilities. In some cases this means only individuals trained to

teach students with a particular disability. These personnel requirements have been overcome by careful documentation on the student's Individual Educational Program (IEP) of who would provide specific educational services. Interestingly, special education teachers feel that they lose their status and position in co-teaching arrangements with regular classroom teachers. This suggests some perceived "pecking order" among teachers and specialists that can interfere with building true collaboration in some schools and is consistent with the earlier comments of Dr. Pat Anthony about the very distinct programs which exist in the school districts.

Bilingual administrators are overwhelmingly negative about what they perceive as a lack of knowledge and competence among special educators in the area of bilingual education. They feel that special educators are in need of massive professional development related to non-English speaking students. The perception is that special education teachers tend to see the bilingual student as learning disabled or somehow learning impaired, as opposed to a non-English speaker.

## **The "Power" of Special Education**

Among the more frequently expressed concerns of nonspecial educators is that special education will "take over" in any consolidated program and will usurp all available funding because of the special education entitlement of required services. There is a strong feeling that students with disabilities are protected by a very rigid special education law and that these students will get whatever they need regardless of the cost. Nonspecial education administrators believe that any consolidation will result in commingling of funds and would reduce funding and services for their categories of students in order to fund special education and related services. Some of these administrators feel that they need to guard their resources and their staffs, as well as maintain the integrity of their service delivery systems. In addition, Title I has a history of using aides or of having lower standards and lower pay scales for teachers. While the pay inequities reportedly have long been addressed, there is still a perception, if not a reality, that special educators are better trained, have more advanced degrees, and will "take over" in a consolidated program model. Despite the image of special education as a potential predator on other categorical programs, special educators also express some of these same insecurities under a more consolidated model.

Special education administrators also note this turf guarding and recognize that some of their colleagues are concerned about how they would lose out if programs were consolidated. Several examples were given of local districts consolidating programs at the central office with the former special education director becoming the new administrator. This was attributed to two factors: (a) the individual was perceived as taking a lead in pushing for more collaboration to foster inclusion and reduce referrals to special education; and, equally important, (b) the district needed to make certain that the administrator was very knowledgeable about all of the special education procedural safeguards. Given the concerns about legal issues, nonspecial education administrators felt that they would not be a likely first choice to administer a consolidated program. Some individuals also were very candid in suggesting that the fear of losing programs or resources was complicated by race or culture. In some areas, the program directors for special education were white, while Title I and bilingual education directors were nonwhite. Each program had staked out its own power base with staff as well as parents and the community, frequently of the same race and ethnicity. Attempts to consolidate or move toward more collaboration were very difficult in these districts.



## VI. Summary and Conclusions ---

This research has attempted to provide a snapshot of some of the current practices and issues involved in the blending of categorical educational programs. Clearly there is still a long way to go in creating the types of flexible educational systems that are being promoted in current federal and state restructuring initiatives. Despite the encouragement and, to some degree, the regulatory flexibility provided by the federal and state governments, local districts continue to administer and offer separate programs. However, within these separate administrative structures, there is clearly a move to foster greater collaboration at the school building level with less segregation of staff and students within classrooms. The focus on inclusion of students with disabilities is having a significant influence on fostering that collaboration. In addition, rapidly changing demographics and increasing fiscal pressures in the nation's schools are creating pressures on local districts to use resources more efficiently and to look to new and more flexible ways to educate increasingly diverse student populations. However, a deeply embedded culture of program separation appears to support turf guarding and reinforce the belief that "different types" of students need very different educational experiences.

Finally, there are the realities within the federal and state laws and regulations that govern categorical programs. The basic intent that categorical programs should supplement and not supplant the education provided by local districts is widely endorsed. Yet, this concept continues to create the greatest challenges for program administration and design. Program administrators held out hope that the Title 1 and IDEA reauthorizations would offer new flexibility in the form of more schoolwide programs and more opportunity to support at-risk students without formally identifying them as disabled. Some believed that the keys to success are through coordinated administration accompanied by a set of learner outcomes and clearly specified procedures for demonstrating accountability for

those outcomes. Without such a system, any flexibility in the use of resources would make the various groups of special need students vulnerable to a loss of services.

Despite a longstanding culture of separatism and the fear of legal repercussions, districts and/or individual schools are taking advantage of increased state-level flexibility to explore new collaborative educational models. In general, these models are designed to use school staff more flexibly and to provide a more coordinated and comprehensive education to students who need compensatory or specialized instruction. The collaborative approaches reviewed in this paper are only some of the ways in which schools are attempting to provide more flexible programs. The degree of fiscal and other regulatory flexibility varies across these programs as well. However, several conclusions can be drawn from the information obtained from this study.

First, it is important to note that neither federal nor state policy changes designed to foster more program consolidation are sufficient to create the types of programs outlined in this paper. Each and every one of the models or attempts to do things differently resulted from leadership at the grass roots and a commitment to change. Among the more important factors considered were the joint administrative meetings at the district level and a strong building principal who could support teachers and other staff in doing things in new ways. Among those who were reportedly most resistant to increased flexibility were those who administered Title I programs. Their resistance might be attributed to the punitive history of audits, as well as a perception that special education would consume the major resources in any sort of program consolidation.

The second point to be made is that all of the attempts to consolidate programs are occurring within an approved fiscal accountability system. That is, funds are rarely mingled, although resources can be used more flexibly. In the relatively few instances where funds are blocked within a school budget, the funds flow to the school based on a state-approved formula and are disaggregated at the district level. The flexibility appears at the classroom level where the teachers can work with heterogeneous groups of students. In these models, accountability is focused less on ensuring how teachers spend their time than with ensuring that students are making progress or that services specified on the IEPs are delivered.

The consolidation of programs has been aided by recent changes in Title I, such as schoolwide programs and the opportunity for states to apply to the federal Title I administration for permission to use alternative service delivery models. The "replacement model" described in this paper is one of the models that has been approved. Other models for fiscal accountability which provide greater flexibility have reportedly been adopted in some states. Flexibility with respect to the use of special education resources was most likely limited to the use of state and local special education funds, although local administrators manage budgets, the source of which is largely unknown to them. Other supplementary programs, such as bilingual education, vary significantly in terms of how much they are consolidated. This is due, in part, to the variability among districts in numbers of non-English speaking students. There appears to be little concern about the consolidation of bilingual resources or programs except in those districts with large numbers of multifunded students or students who are eligible for two or more supplementary programs.

In summary, efforts to promote greater flexibility and coordination among programs are successful in a number of school districts, due in large part to a combination of strong local leadership and state-level assistance. An important barrier to the consolidation of categorical programs exists in the nature of these programs, in that they are designed to supplement the basic education provided to all students. Through both program and fiscal audits, school districts have been held closely accountable for ensuring that eligible students were indeed receiving extra educational services. Now, however, under the aegis of school reform efforts, a more powerful type of accountability is emerging, which is accountability for improved student performance on critical educational outcomes. This notion of accountability for results can be seen in mechanisms such as the ESS program in California, as well as the Massachusetts restructuring initiative. In these pilot efforts, the emphasis is being placed on schoolwide improvement and the increased success of each student, regardless of his or her unique learning needs. An important factor in the success of these efforts will be the requirement to design them within the confines of federal and state categorical program regulations.

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# Appendix A

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## List of Interviewees

Chuck Acosta  
Consultant for Bilingual Education  
Los Angeles County Department of Education

Pat Anthony  
Associate Professor  
University of Massachusetts, Amherst

Lynn Baugher  
Manager, Consolidated Programs and Information Management  
California State Department of Education

Wade S. Brynson  
Assistant Superintendent for Compliance  
Consolidated Programs and ESS Program  
California State Department of Education

Barbara Ellen  
Director, Program Delivery  
Orange County Department of Education, California

Martha Fields  
Executive Director  
National Association of State Directors of Special Education  
Alexandria, Virginia

Ronald Friend  
Chief, Compensatory Education  
Maryland State Department of Education

Glenn Hammerbacher  
Director of Special Education  
Worcester County Public Schools, Maryland

Steve Johnson  
Administrator for Management and Coordination  
& Assistant to the Director of Special Education  
California State Department of Education

Pamela Kauffman  
Administrator  
Program Quality Assurance Services  
Massachusetts State Department of Education

Terry Larsen  
Director of Categorical Programs  
Alhambra School District, California

Martin Leggott  
Assistant to the Superintendent  
Irving School Union, Massachusetts

Leonard Lubinsky  
Superintendent  
Irving School Union, Massachusetts

Elizabeth Pinkerton  
Director of Categorical Programs  
Elk Grove School District, California

John E. Phelan, Jr.  
Assistant Superintendent of Schools  
Haverhill School District, Massachusetts

Judy Schrag  
Consultant  
National Association State Directors of Special Education

Stewart Scott  
Principal  
Worcester County Public Schools, Maryland

Kenneth Sennett  
Director of Special Education  
Brockton School District, Massachusetts

Richard Steinke  
Assistant Superintendent for Special Education  
Maryland State Department of Education

Edward Lee Vargas  
Assistant to the Superintendent  
Division of Support Services  
Santa Ana Unified School District, California

## Appendix B

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### Guiding Questions for the Interviews

- What programs are affected by the new integrated service "model"?
- What funds are being blended or integrated? What proportion of the total (agency or program) budget is involved?
- What is the purpose of this integration? What are you trying to achieve?
- What is the history of this effort—how did the initiative begin, who is involved, what is the depth of policy change?
- What policies, if any, have been changed? What policies are being waived? Describe the waiver process.
- Where are the funds integrated (at the service site, at the administrative level)?
- What accounting procedures and requirements exist regarding separating funds?
- How is eligibility for the integrated program determined? Does this differ from previous criteria or procedures?
- What do the integrated programs look like? How are staff utilized? Do roles change? Is equipment shared? Who pays for nontraditional services (eg., wrap-around)?



- What have been the difficulties or what has been the down side related to this type of program integration?
- What have been the perceived benefits of these programs?
- Have they been successful in improving the services received by students? How do you know?
- What are your future plans regarding program integration?
- Should all schools be moving in this direction? Why or why not?
- What barriers to the successful implementation of program integration exist in federal and state policies?

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